

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

HEADWATER RESEARCH LLC,

Plaintiff,

v.

T-MOBILE US, INC., T-MOBILE USA,
INC., and SPRINT CORP.,

Defendants.

Civil Action No. 2:23-cv-00379-JRG-RSP

(Lead Case)

JURY DEMANDED

HEADWATER RESEARCH LLC,

Plaintiff,

v.

T-MOBILE US, INC., T-MOBILE USA,
INC., and SPRINT CORP.,

Defendants.

Civil Action No. 2:23-cv-00377-JRG-RSP

(Member Case)

JURY DEMANDED

**JOINT MOTION FOR ENTRY OF AGREED
DISCOVERY ORDER**

Plaintiff Headwater Research, LLC (“Headwater”) and Defendants T-Mobile USA, Inc. (“T-Mobile USA”), T-Mobile US, Inc. (“T-Mobile US”), and Sprint Corp. (“Sprint”) (collectively, “T-Mobile” or “Defendants”),¹ (all together, the “Parties”) hereby jointly request that the Court enter the proposed Discovery Order, attached hereto as Exhibit A.

¹ Defendants assert that T-Mobile US, Inc. is not a proper party to this lawsuit and is not subject to personal jurisdiction in this District, such that this order only binds the other named defendants.

Dated: December 18, 2023

/s/ Katherine Q. Dominguez

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CERTIFICATE OF SERVICE

I hereby certify that all counsel of record who are deemed to have consented to electronic service are being served this 18th day of December 2023, with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3).

/s/ Marc Fenster

Marc Fenster

CERTIFICATE OF CONFERENCE

The undersigned certifies that counsel complied with the requirements of Eastern District of Texas Local Rule CV-7(h). The parties are in agreement on filing this Joint Motion.

/s/ Marc Fenster
Marc Fenster